

# Richard W. Young Sr., Esq.

*ATTORNEY AT LAW*  
863 ISLIP AVENUE  
CENTRAL ISLIP, NEW YORK 11722-4816  
PHONE - (631) 224-7500  
FAX - (631) 224-9400  
***WWW.YOUNGANDYOUNGESQ.COM***

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## **VIA ECF**

Magistrate Judge Steven I. Locke  
U.S. District Court, Eastern District of New York  
100 Federal Plaza  
Central Islip, N.Y. 11722

Re: Spronz v. County of Suffolk, et al.  
2:23-cv-03689-JMA SIL

Dear Judge Locke:

We as plaintiff dispute Ms. Zwilling's account of the facts. Ms. Zwilling has informed plaintiff that she is retiring in 90 days. Further, her utter failure to provide proper discovery is noted. Ms. Zwilling postponed a previously scheduled deposition at financial cost to my client. She then requested our consent to an adjournment of this conference which was denied. We advised her that the plaintiff's deposition must proceed. After several communications the deposition of the plaintiff was scheduled and held. She then renewed her request for plaintiff's consent for this adjournment which again was declined.

Since Ms. Zwilling is retiring, the Suffolk County Attorney's office should assign an attorney who can proceed forward without the use of future delay tactics seeking more adjournments as this matter lingers in litigation limbo.

The Court should note that Ms. Zwilling scheduled the plaintiff's deposition via Zoom. Co-counsel, Mr. Cory Morris, conducted this deposition from Florida. During the deposition Ms. Zwilling constantly complained that she could not hear plaintiff's counsel or plaintiff. Notwithstanding, the court reporter stated that she was having no problem hearing either counsel or plaintiff. At one point plaintiff's counsel leaned closer to the computer microphone in an attempt to aid Ms. Zwilling and was immediately accused of trying to intimate her.

In closing, we see no reason to postpone this Court conference based upon an attorney who has openly informed plaintiff that she will not be involved in this matter in the very near future. To do so will only lead to future delays and lay the ground work for future excuses of being unprepared by the Suffolk County Attorney's office.

Very truly yours,

Richard W. Young, Sr., Esq.  
(RWY7633)